

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL, and
LAUREN SALZMAN,

Defendants.

No. 18-cr-204 (NGG) (VMS)

**NOTICE OF MOTION TO DISMISS THE S-2 INDICTMENT
OR IN THE ALTERNATIVE FOR A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated March 22, 2019, the Declaration of Kathleen E. Cassidy, dated March 22, 2019, and the exhibits appended thereto, Defendant Clare Bronfman moves this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the S-2 Indictment or, in the alternative, directing the government to provide a bill of particulars, and for such other and further relief as the Court may deem proper.

Dated: March 22, 2019
New York, New York

Mark J. Geragos
Geragos & Geragos, APC
644 S. Figueroa St.
Los Angeles, CA 90017
(213) 625-3900

Tina Glandian
Geragos & Geragos, APC
256 5th Avenue
New York, New York 10001
(213) 625-3900

/s/ Alexandra A.E. Shapiro
Alexandra A.E. Shapiro
Fabien M. Thayamballi
Shapiro Arato Bach LLP
500 Fifth Avenue, 40th Floor
New York, New York 10110
(212) 257-4880

Kathleen E. Cassidy
Caroline M. Grosshans
Hafetz & Necheles LLP
10 East 40th Street, 48th Floor
New York, New York 10016
(212) 997-7400

Attorneys for Defendant Clare Bronfman